

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
v.)	Case. No. 4:19-MJ-647-BJ
)	
)	
BO MAO,)	
)	
)	
Defendant.)	
)	

UNOPPOSED MOTION TO CONTINUE PRELIMINARY HEARING

The defendant, Mr. Bo Mao, by and through counsel respectfully moves this Honorable Court to continue his preliminary hearing, currently set for August 20, 2019 at 10:00 a.m. until September 4, 2019. In support of this motion, counsel states as follows:

The government filed a criminal complaint against Mr. Mao in the Northern District of Texas on August 14, 2019. Mr. Mao made his initial appearance in this Court on August 15, 2019, at which time the Court set a combined preliminary hearing and detention hearing for August 20, 2019. Following Mr. Mao's initial appearance, defense counsel has been working with the government on an agreement by which Mr. Mao would be released, subject to conditions, and in which the case would proceed by way of an Information. As part of this agreement, Mr. Mao agrees to continue his preliminary hearing, set for August 20, 2019, until September 4, 2019.

Accordingly, Mr. Mao respectfully requests that the Court continue his preliminary hearing until September 4, 2019, but maintain tomorrow's court date on the calendar so that he may appear before the Court for the purpose of setting release conditions.

Respectfully Submitted,

JASON HAWKINS
Federal Public Defender

BY: /s/ Loui Itoh
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Certificate of Conference

I, Loui Itoh, hereby submit the following certificate of conference. Undersigned counsel conferred with AUSA J. Stevenson Weimer on August 19, 2019. The Government does not oppose this motion to continue.

/s/ Loui Itoh
LOUI ITOH

Certificate of Service

I, Loui Itoh, hereby certify that on August 19, 2019, I electronically filed the Motion to Continue with the clerk for the U.S. District Court, Northern District of Texas, using the electronic filing system for the Court. The electronic case filing system sent a “Notice of Electronic Filing” to AUSA, J. Stevenson Weimer.

/s/ Loui Itoh
LOUI ITOH